

Identified Problems/Irregularities in Certification Test Report and Applicable Regulatory Basis and/or Test Method

Pursuant to the 2015 Wood Heater Rule, manufacturers must conduct a valid certification test using the prescribed test methods and procedures for each wood heater model. *See* 40 C.F.R. § 60.534.

Primary Identified Problem or Irregularity

Our review of SMG's June 26, 2015 (revised on March 15, 2021) certification test report found that the certification test was invalid because it was not conducted in accordance with the 2015 Wood Heater Rule and applicable test method. Specifically, the medium burn rate Category was greater than 50% of the maximum burn rate Category. The American Society for Testing and Materials (ASTM) Test Method E2779, Section 9.4.1.2, states, *"For burn rates in the medium segment, except as allowed in 9.4.1.4 or 9.4.1.5, the pellet heater shall be operated with the control or controls set in the position(s) as needed to achieve a burn rate that is ≤ 50 % of the maximum burn rate."* However, the Subject Pellet Model certification test report documented a maximum burn rate of 2.73 kg/hr and a 1.69 kg/hr medium burn rate. To meet the requirements of the ASTM E2779, Section 9.4.1.2, the medium burn rate should have been equal to or below 1.365 kg/hr. Therefore, because the certification test's medium burn rate Category was not equal to or less than 50% of the maximum burn rate, EPA has determined that the certification test is invalid.

Additional Problems or Irregularities

EPA's review also found the following issues in the test report, which should be addressed in subsequent reports submitted to EPA.

Test Report Problems or Irregularities	Regulatory Citation and/or Test Method	Information Needed to Address Problems or Irregularities
Missing Information – Example Calculations.	40 C.F.R. § 60.533(b)(5)	The test report must include example calculations for parameters/equations used to determine the following: Total weight of fuel, Dry burn rate, Average gas velocity in the dilution tunnel, Average gas flow rate in dilution tunnel, Volume of gas sampled, Total particulate matter collected, Concentration of particulate matter in tunnel gas, dry basis, Total particulate emissions, Proportional rate variation, Particulate emissions for the test run, and Particulate emission factor for test run.

Test Report Problems or Irregularities	Regulatory Citation and/or Test Method	Information Needed to Address Problems or Irregularities
Compliance Determination Cannot be Made - Convection Fan.		The test report must be revised to clarify if the internal convection fan (fan blows hot air into the room) was operating during testing.